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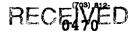
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AUG 1 6 1993

August 16, 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. William F. Caton Acting Secretary Federal Communications Commission 1919 M Street, N.W., Room 222 Washington, DC 20554

Attention: Allocations Branch

RE: MM Docket No. 93-174

Comments of Twin Lakes Communications, Inc.

Owensville and Versailles, Missouri

Dear Mr. Caton:

Transmitted herewith, on behalf of Twin Lakes Communications, Inc., licensee of KLGS(FM), Versailles, Missouri, are an original and four copies of its Comments in the above-referenced proceeding.

Should any additional information be required, please contact this office.

Very truly yours,

FLETCHER, HEALD & HILDRETH

Frank R. Jazzo

Counsel for

Twin Lakes Communications, Inc.

FRJ/rhw Enclosure

cc: Davel Broadcasting Group, Inc. (w/enclosure)

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BEFORE THE

Federal Communications Commission

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FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

In the Matter of)		/
Amendment of Section 73.202(b) Table of FM Allotments)	MM Docket No. 93-174 RM-8263	/
Owensville and Versailles, Missouri	Ś	NH 0203	

To: Chief, Allocations Branch

COMMENTS

Twin Lakes Communications, Inc. ("Twin Lakes"), licensee of FM station KLGS, Channel 236A, Versailles, Missouri, by its attorney, submits its Comments in response to the Notice of Proposed Rule Making ("NPRM"), MM Docket No. 93-174, DA 93-665, released June 25, 1993, wherein the Commission proposes to amend Section 73.202(b) of its Rules (the Table of FM Allotments), by substituting Channel 236C3 for Channel 236A at Versailles, Missouri, and modifying the license of KLGS to specify operation thereon, and by substituting Channel 237A for Channel 237C2 at Owensville, Missouri, and modifying the license of FM Station KLZE, Owensville, Missouri, to specify operation thereon.

Twin Lakes hereby restates its support for the proposed channel substitutions at Versailles and Owensville, Missouri, and the proposed license modifications of KLGS and KLZE. Since Channel 236C3 is a higher class co-channel, in accordance with Section 1.420(g)(3) of the Commission's Rules, the modification of license of KLGS may be made without considering competing expressions of

interest or demonstrating the availability of an additional equivalent or higher class channel at Versailles, Missouri.

Twin Lakes hereby restates its present intention to promptly apply for a construction permit and, when granted, to expeditiously construct upgraded facilities for KLGS, when the Commission adopts the proposed channel substitutions and license modifications. The proposed substitution of Channel 236C3 for Channel 236A at Versailles, Missouri, can be made in full compliance with the Commission's minimum spacing requirements at proposed reference coordinates of 38° 23′ 27" N; and 92° 38′ 06" W, provided KLZE's authorization is downgraded to Channel 237A consistent with its present operation. The proposed upgrade of KLGS will provide Versailles, Missouri, with its first wide-area coverage FM service and will permit Twin Lakes to improve significantly KLGS's service to Versailles, Missouri and the surrounding area.

WHEREFORE, for the foregoing reasons, Twin Lakes respectfully requests that the Commission amend Section 73.202(b) of the Commission's Rules by substituting Channel 236C3 for Channel 236A at Versailles, Missouri, and modify the license of KLGS to specify operation thereon.

Respectfully submitted,
TWIN LAKES COMMUNICATIONS, INC.

rank P Tazzo

Its Attorney

FLETCHER, HEALD & HILDRETH 11th Floor 1300 North 17th Street Rosslyn, Virginia 22209 (703) 812-0400 August 16, 1993

CERTIFICATE OF SERVICE

I, Roberta Wadsworth, a secretary in the law offices of Fletcher, Heald & Hildreth, hereby certify that I have on this 16th day of August, 1993, had copies of the foregoing "COMMENTS" mailed by U.S. Mail first class, postage prepaid, to the following:

Davel Broadcasting Group, Inc. 309B N. First Street Owensville, Missouri 65066

Roberta Wadsworth